

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

NATIONAL COALITION ON BLACK CIVIC
PARTICIPATION, MARY WINTER, GENE
STEINBERG, NANCY HART, SARAH
WOLFF, KAREN SLAVEN, KATE KENNEDY,
EDA DANIEL, and ANDREA SFERES,

Plaintiffs,

-and-

People of the STATE OF NEW YORK, by its
attorney general, LETITIA JAMES, ATTORNEY
GENERAL OF THE STATE OF NEW YORK,

Plaintiff-Intervenor,

v.

JACOB WOHL, JACK BURKMAN, J.M.
BURKMAN & ASSOCIATES, LLC, PROJECT
1599, and JOHN and JANE DOES 1-10,

Defendants.

Civil Action No. 20-cv-8668

**NOTICE OF MOTION FOR PLAINTIFFS' JOINT MOTION TO STRIKE
DEFENDANTS' RULE 56.1 STATEMENT**

For the reasons set forth in Plaintiffs' Memorandum of Law in Support of Plaintiffs' Joint Motion to Strike Defendants' Rule 56.1 Statement and In Opposition to Defendants' Motion for Summary Judgment, and the Declaration of Marc P. Epstein in Support of Plaintiffs' Joint Motion to Strike and in Opposition to Defendants' Motion for Summary Judgment and the Exhibits attached thereto, Plaintiffs National Coalition on Black Civic Participation Mary Winter, Gene Steinberg, Nancy Hart, Sarah Wolff, Karen Slaven, Kate Kennedy, Eda Daniel, and Andrea Sferes, and Plaintiff-Intervenor People of the State of New York respectfully request that the Court grant Plaintiffs' Joint Motion to Strike Defendants' Rule 56.1 Statement.

Dated: New York, New York
August 12, 2022

LETITIA JAMES

*Attorney General
State of New York*

By: /s/ Rick Sawyer

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Respectfully submitted,

By: /s/ Franklin Monsour Jr.

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